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9	daniel.weiner@hugheshubbard.com			
10	Attorneys for Defendant Imperial Pacific International (CNMI), LLC			
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10	IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN MARIANA ISLANDS			
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13	FOR THE NORTHE			
	FOR THE NORTHE TIANMING WANG, et al.,			
13	FOR THE NORTHE TIANMING WANG, et al., Plaintiffs,			
13 14	FOR THE NORTHE TIANMING WANG, et al., Plaintiffs, v.	RN MARIANA ISLANDS Civil Action No. 1:18-cv-00030 DEFENDANT'S MOTION TO APPEAR		
13 14 15	FOR THE NORTHE TIANMING WANG, et al., Plaintiffs, v. GOLD MANTIS CONSTRUCTION DECORATION (CNMI), LLC; MCC	RN MARIANA ISLANDS Civil Action No. 1:18-cv-00030		
13 14 15 16	FOR THE NORTHE TIANMING WANG, et al., Plaintiffs, v. GOLD MANTIS CONSTRUCTION DECORATION (CNMI), LLC; MCC INTERNATIONAL SAIPAN LTD., CO.; and IMPERIAL PACIFIC INTERNATIONAL	RN MARIANA ISLANDS Civil Action No. 1:18-cv-00030 DEFENDANT'S MOTION TO APPEAR		
13 14 15 16 17	FOR THE NORTHE TIANMING WANG, et al., Plaintiffs, v. GOLD MANTIS CONSTRUCTION DECORATION (CNMI), LLC; MCC INTERNATIONAL SAIPAN LTD., CO.; and IMPERIAL PACIFIC INTERNATIONAL (CNMI), LLC,	RN MARIANA ISLANDS Civil Action No. 1:18-cv-00030 DEFENDANT'S MOTION TO APPEAR		
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COMES NOW, Defendant Imperial Pacific International (CNMI), LLC ("IPI" or
"Defendant"), by and through undersigned counsel, and hereby requests the Court allow counsel
Kevin T. Abikoff and Daniel H. Weiner to appear by video-teleconference at the hearing on IPI's
Motion for Reconsideration of Default Judgment on July 29, 2021, at 9:00 a.m. Defendant's
counsel makes this request for the following reasons:

- 1. Mr. Abikoff does not reside in the Northern Mariana Islands and is currently in Washington, DC.
- 2. Mr. Weiner does not reside in the Northern Mariana Islands and is currently in New York, NY.
- 3. Due to the restrictions in place due to COVID-19 and other pre-existing obligations, Mr. Abikoff and Mr. Weiner cannot travel to Saipan for the hearing on the motion.
- 4. It is Defendant's understanding that appearances by video-teleconference are "encouraged when that practice will save the attorneys, parties, or court time and money." LR 83.4(b).
- 5. An appearance by video-teleconference by Mr. Abikoff and Mr. Weiner would not prejudice either party.

Local counsel Michael Dotts will attend in person. Kevin T. Abikoff can be reached at (917) 513-6029, and Daniel H. Weiner can be reached at (917) 574-3407.

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1	Dated: July 15, 2021	Respectfully Submitted,
2		/s/ Kevin T. Abikoff Kevin T. Abikoff, Esq. (<i>Pro Hac Vice</i>)
3 4		Daniel H. Weiner, Esq. (<i>Pro Hac Vice</i>) HUGHES HUBBARD & REED LLP One Battery Park Plaza
5		New York, New York 10004
6		Attorneys for Defendant Imperial Pacific International (CNMI), LLC
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9	daniel.weiner@hugheshubbard.com	
10	Attorneys for Defendant Imperial	
	Pacific International (CNMI), LLC	
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12		ATES DISTRICT COURT RN MARIANA ISLANDS
13	TOR THE NORTHE	NIV IVITATI ISLITIVOS
	TIANMING WANG, et al.,	
14	D1 : .:.cc	
15	Plaintiffs,	Civil Action No. 1:18-cv-00030
	v.	Civil Action No. 1.16-cv-00050
16	· ·	CERTIFICATE OF SERVICE
	GOLD MANTIS CONSTRUCTION	
17	DECORATION (CNMI), LLC; MCC	
18	INTERNATIONAL SAIPAN LTD., CO.; and IMPERIAL PACIFIC INTERNATIONAL	
10	(CNMI), LLC,	
19	(61.1.11), 226,	
	Defendants.	
20		
21	I hereby certify that on July 15, 2021, I	electronically filed the foregoing with the Clerk of
22	Court for the United States District Court for th	e Northern Mariana Islands using the CM/ECF
		č
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1	system. A true and correct copy of this motion has been served via the Court's CM/ECF system on
2	all counsel of record.
3	/s/ Kevin T. Abikoff Kevin T. Abikoff
4	Kevin T. Abikoff
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